

[General](#)

[Conflict of Interest](#)

[Media Statements](#)

[Protecting Personal and Business Information](#)

[Roles Outside Asda](#)

[Additional Questions](#)

[Back to Top](#)



## Ethics Topics – General

We get asked a lot of questions about ethics in Asda and it's important everyone in the business understands our policies. The FAQs below should help with most queries, but if you can't find what you're looking for or want to discuss a specific issue, please e-mail Asda Ethics. We're always happy to help.

### What is an Ethics Concern?

An ethics concern is one that involves alleged behaviour or business practices that are not consistent with our statement of ethics.

[Back to Top](#)

## Ethics Topics – Conflict of Interest

Maintaining objectivity in our business relationships is essential to earning the trust of our stakeholders and promoting our culture of integrity,

A conflict of interest can arise when you are in a position that could lead to you have split loyalties between your role at Asda and another party. Even if it's not intentional, the appearance of a conflict may be just as damaging to your reputation and Asda's reputation, as an actual conflict.

Conflicts can arise where:

- i. A member of your family or a close friend works for a supplier or a competitor. However, in reality this is only a true conflict of interest when:
  - You have either direct or indirect business influence over the relationship with the supplier in question
  - You control the same area in Asda that your family or friends work in for a competitor.
- ii. You hold shares in a supplier or a competitor worth more than £10,000.
- iii. You're in a relationship (family, romantic or dating) with someone in your team or your partner works for Asda and there is a direct or indirect reporting influence.
- iv. A supplier, competitor or charity offers you gifts, entertainment or gratuities – see more detailed Q&A on this area below.

To safeguard yourself from any allegation of wrong-doing, you should disclose any potential conflict of interest Global Ethics, via the Asda Ethics e-mail address and to your Line Manager. They'll then work with you to decide how the situation will be handled and, where appropriate, record the details in the Conflict of Interest log.

The COI log is a confidential document which is only available to Global Ethics and the Asda Ethics Office. If in doubt about whether a particular situation would be a conflict of interest, contact Global Ethics via the Asda Ethics Office to discuss.

### **I have been offered tickets for an event by my supplier. Can I attend if I pay the face value of the tickets?**

No. You should politely decline the offer. Although you may be paying face value for the tickets it's unlikely to reflect the true market value. The difference between the face value and fair market value would also be considered a gift. You should also consider that you are only able to access the tickets because of your relationship with the supplier and this could be seen as a conflict of interest.



**I have been invited to an industry charity event to sit at a supplier table as their guest. Can I attend?**

You must have a valid business reason for attending and obtain advance approval to attend, in writing from your line manager. You are responsible for making sure the supplier invoices Asda for the full cost of your attendance including any accommodation and transport costs. The supplier cannot pay any costs on your behalf. If you're invited to attend the same charity event by an industry forum rather than a supplier, you can attend at their cost.

**I have been told I can accept a supplier invitation and do not have to reimburse the supplier for the cost as long as I log the event on the departmental ethics tracker. Is this right?**

No. The ethics tracker was implemented purely to raise awareness of Asda's ethics policy. If something is in breach of our policy, recording it on the ethics tracker does not change the breach. From June 2013, you no longer need to log supplier entertainment on the ethics tracker. Global Ethics believes colleagues are now aware of the policy and have replaced the tracker with education and communication about our policies.

**Can I car share with a supplier when travelling to one of their sites, or a business meeting or event that we both need to attend?**

If it is more cost effective for you to travel with a supplier, this is OK provided that you pay your portion of the travel expenses. It's important to be transparent and let your line manager know your plans.

**If I'm travelling internationally can suppliers provide transport? Do I need to reimburse them?**

Yes. You should only use supplier transport in areas where there are potential safety issues with using public transport. You must inform your line manager in advance and ensure you either pay and get a receipt whilst you are visiting the supplier, or you must personally make sure Asda is invoiced for all costs incurred. If you're visiting a new supplier who is not set up on our systems and cannot invoice us, you must ensure that you pay all costs during your visit and get a receipt.

**Can we pay for supplier's/third parties' meals or entertainment?**

You can pay for meals for suppliers and/or third parties. However, this is not consistent with our EDLC approach. You must get your line manager's approval in advance. To protect you from possible allegations of bribery, any entertainment you give must be reasonable (not excessive or lavish), must not be intended to influence a deal and must be allowed under the UK Bribery Act of 2010 and the United States Foreign Corrupt Practices Act (FCPA).

**Can we reciprocate? (Where we pay for lunch/drinks on one occasion, and the supplier pays on the next)?**

No. To avoid any possibility and/or perception of a conflict of interest, Asda colleagues must pay all their own costs each time they buy something.

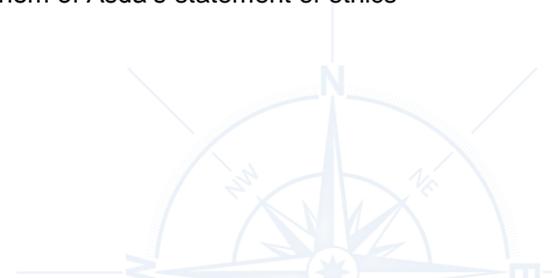
**Does Asda have any guidelines about lunch meeting with a supplier or potential supplier?**

If there is a legitimate business need for meeting with the supplier or potential supplier, you can join them for lunch or dinner meetings as long as the meeting is agreed with your line manager and Asda pays for your food and beverages. It's important to remember that you should treat each supplier fairly. If you meet one supplier or potential supplier for lunch or dinner, then you would also need to be open to meeting other suppliers or potential suppliers for lunch or dinner.

**A supplier has sent me a gift. What should I do with it?**

You should return the gift where this is practicable. If this is not possible, you should give the gift to the Asda Foundation who will log that they have received it. If the gift includes fresh items that will not last, you may share these with the colleagues in your department with your line manager's permission. You must send a written correspondence to the supplier reminding them of Asda's statement of ethics and advising them that you have not been able to keep the gift.

[Back to Top](#)



## COI Charity Events

### **My friend works for a supplier who's sponsoring a charity golf tournament. My friend asked me to play and offered to pay the fee. Can I go?**

As a Asda colleague, your business relationships with your suppliers should be based on objective and fair criteria. In order to remain objective and fair, it is a best practice to avoid social interactions with your suppliers. If you do not have a business relationship with the supplier in question, there is no direct conflict with you playing on the supplier's team and your friend's company may pay for your fees, as long as this is truly a personal relationship.

### **One of our suppliers would like to make a donation on behalf of Asda to a local charity. Is that acceptable?**

To protect our fair and objective relationship with suppliers, we do not approve of donations made on our behalf nor should we use our position at Asda to influence where our suppliers make contributions.

### **I am organising an event to raise money for one of Asda's National Charities, can I contact my suppliers to invite them to the event?**

To ensure that you do not place undue pressure on your suppliers, you should not contact them directly. Invites should come from the charity and can be endorsed by Asda colleagues. You can advertise the event on supplier websites, atrium screens and other generic communication forums.

### **Can I ask suppliers to co-sponsor an Asda charity event?**

Yes, you can ask for co-sponsorship, but funding must go directly from the supplier to the charity. In addition:

- If a supplier wants to donate items to be used in the tournament, whether it is gifts for the participants, or refreshments, the items must be paid for at Asda cost.
- If it is an item that Asda does not sell, we should pay the supplier the fair market value of the item.
- If a supplier provides hole-sponsorship for a co-sponsored golf tournament, they will need to receive appropriate recognition for the contribution and ensure that the funds are given from the vendor directly to the non-profit.

### **I attended an Asda charity event and was offered a gratuity by someone from the charity. Can I accept?**

To ensure that you treat the charity objectively and fairly, you should not accept any gifts or gratuities from Asda's charity partners. Use good judgement and ask yourself:

- Am I being offered the gift to influence my business judgement?
- Could accepting the gift create the appearance of impropriety?

If the answer to either of these questions is yes or maybe, then you should decline the gift.

[Back to Top](#)

## COI – Financial Investments

### **I recently joined Asda and I own more than \$20,000 of shares in a key competitor. Should I sell the shares?**

As an Asda colleague, you have a responsibility to make sure your personal financial activities do not conflict with your responsibilities at work. A conflict would exist if you have a substantial financial investment in a competitor. If you own more than \$20,000 of stock in a competitor, you should disclose your stock ownership information to your manager and Global Ethics. Global Ethics will review your situation and offer you further direction on how to handle your stock ownership.



## COI – Personal Relationships

### **I indirectly manage a member of my family. They don't report directly to me. Is this OK?**

A conflict of interest exists when you manage someone with whom you have a family or romantic relationship. Even if you're acting properly, your relationship is likely to be seen as influencing your judgement. This can damage morale and disrupt workplace productivity. So, you may not directly or indirectly supervise any family members or colleagues with whom you have a close personal relationship.

[Back to Top](#)

## Ethics Topics – Media Statements

### **If I'm presenting to trade bodies or at conferences, do I need to have communication and answers vetted?**

Yes. You should get approval to present from your line manager and then both your line manager and Corporate Affairs must approve the content of your presentation in advance. Any financial data must also be approved by Finance.

### **I have been asked to speak at a conference on my own personal time. The organisers will pay my travel and accommodation. Since it's my personal time is that ok?**

You need to obtain your line manager's approval to speak at events like these. Your manager and Corporate Affairs should also approve the content of your presentation in advance. Even though the conference is during the weekend, you are still on Asda business and should follow workplace policies. This means you must get approval in advance for the costs involved, from your line manager. You should then pay for your own travel and accommodation at the conference and claim back through Global Expenses.

### **I received a bottle of champagne from an industry forum for speaking at their conference. Can I keep it?**

No, as presenting at the conference is part of your role at Asda. You should politely return the gift.

### **A reporter has contacted us to ask us to corroborate a story they have heard about an Asda colleague. Is it okay to comment?**

No. Tell the reporter to contact the Public Relations team in Asda House who will answer any questions they have.

[Back to Top](#)

## Ethics Topics – Protecting Personal and Business Information

### **I often work at home on my home computer/tablet. Is it ok for me to send business documents to these devices?**

You should not send confidential business e-mails to non-secure networks. If you're not sure, ISD can help you work out the best way to get your files safely on a secure server. Alternatively request a secure USB stick from ISD which ensures that information is kept in a secure way. GOOD is a secure network.

### **We employ freelancers, contractors, models etc. who work with other retailers/suppliers, should they sign a confidentiality agreement?**



All contractors/ freelancers etc who work for Asda should sign a standard agreement which, amongst other things, obliges them to keep information confidential. This is part of the Contractor Induction Pack available from the People Teams in both Asda and George House.

[Back to Top](#)

### Ethics Topics – Roles Outside of Asda

#### **Can colleagues take up paid roles outside of Asda?**

Any colleague who wants to take up additional employment outside Asda, including non-executive director roles, must get line manager approval. Zone B and above will need to obtain approval from their executive via their line manager. You should also disclose any potential conflicts, created by the additional role, to Global Ethics who will help mitigate or resolve potential conflicts of interest. Management associates can't take up additional employment with a competitor. Colleagues can't be the director of a supplier or competitor organisation whilst working for Asda.

#### **Can I be a trustee of a charity?**

Yes. You should tell your line manager and you should take care to ensure that you aren't put in a position where you have - or may appear to have - a conflict of interest between the interests of the charity and the best interests of Asda.

#### **A former colleague is leaving Asda to go and work for a supplier. Can I work with them in their new role as a supplier?**

A conflict could exist if the colleague is calling on an area that they worked in or had influence over whilst working for Asda. We should not do business with former colleagues in these circumstances within 12 months of their leaving Asda.

#### **Can I run a separate business whilst working for Asda?**

You can run or be involved in a separate business as long as:

- It does not create a conflict of interest with your work at Asda. For example, your business may not interfere with your Asda job responsibilities, use company resources, compete with Asda or reflect negatively on Asda.
- It does not supply products to Asda.
- It does not supply products to any current or potential Asda supplier with whom you have a business relationship or direct or indirect influence.

[Back to Top](#)

### Ethics Topics – Additional Questions

#### **Can I use some of the sampling stock as a reward to colleagues who have done a great job?**

No. Samples are provided to us by our suppliers/potential suppliers so that buyers can review and understand the product. They must only be used for business purposes. Therefore, samples cannot be used as incentives or rewards.

#### **Can I collect loyalty points and air miles when I'm on company business?**

Yes. Asda allows colleagues to collect loyalty points and air miles, provided this doesn't lead you to make more expensive purchasing choices.

[Back to Top](#)

